

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA**

**CIVIL ACTION FILE NO. 5:23-cv-00059**

**CROWN EQUIPMENT CORPORATION**

**Plaintiff,**

**v.**

**DAVID BRADY, WILLIAM TUCKER,  
JOSEPH BOGGS, BRAWTUS  
HOLDING COMPANY, INC. (f/k/a  
Pneu-Mech Systems Manufacturing,  
Inc.), BRAWTUS, MANAGEMENT  
COMPANY, LLC, PNEU-MECH  
SYSTEMS MANUFACTURING, LLC  
(K.N.A. Pneu-Mech Dissolution, LLC),  
PNEU-MECH SYSTEMS  
MANUFACTURING, INC., UNITED  
FINISHING SYSTEMS LLC,**

**Defendants,**

**v.**

**James Andrews and Jerry Trostle,  
Third-Party Defendants.**

**Motion for Extension of Time**

Third-Party Defendants James Andrews and Jerry Trostle, by and through their undersigned counsel, hereby move for an Order extending their time to file a responsive pleading to the Amended Third-Party Complaint (Document No. 86). In support of this motion, Third-Party Defendants submit the following:

1. Third-Party Claimants filed the Amended Third-Party Complaint in this action on July 22, 2024.
2. Pursuant to Rule 12 of the Federal Rules of Civil Procedure, Third-Party Defendants must respond within 21 days, or by August 12, 2024.
3. Counsel for Third-Party Defendants requires additional time to prepare a thorough

response to the Amended Third-Party Complaint.

4. Third-Party Defendants make this Motion for an extension of time for good cause and not for purposes of unnecessary delay.
5. Counsel for Third-Party Claimants consents to this requested extension.
6. A proposed order granting the relief requested will also be submitted.

**WHEREFORE**, Third-Party Defendants, James Andrews and Jerry Trostle, respectfully request an extension of time from August 12, 2024, up to and including September 3, 2024 in which to file a responsive pleading to the Amended Third-Party Complaint.

This the 8<sup>th</sup> day of August, 2024.

**HULL & CHANDLER, P.A.**

By: /s/ Elizabeth Vennum  
Elizabeth Vennum  
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*Counsel for Third-Party Defendants*

**Certificate of Service**

I hereby certify that on this day, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of this filing and an electronic copy of same to all counsel of record registered with the CM/ECF system.

This the 8<sup>th</sup> day of August, 2024,

**HULL & CHANDLER, P.A.**

By:     */s/ Elizabeth Vennum*  
Elizabeth Vennum